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Attorney for ALBERT PLANELLS

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

\* \* \*

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	2:14-cr-260-JAD-GWF
	)	
v.	)	
	)	
ALBERT PLANELLS	)	
	)	
Defendant.	)	
_____	)	

**EXPARTE MOTION FOR AN ORDER ALLOWING INVESTIGATOR TODD  
TOBIASSON TO HAVE CONTACT VISITATION WITH ALLAN PLANELLS**

Comes Now, Defendant Albert Planells, by and through his counsel Chris T.  
Rasmussen, Esq., and submits the following ex parte motion.

**MEMORANDUM OF POINTS AND AUTHORITIES**

Defendant Planells is currently scheduled for trial. The superseding indictment alleges that Planells is involved in up to seven Bank Robberies. Planells denies his involvement in seven bank robberies.

The discovery provided by the Government contains videos and still photography that does not depict Planells inside any of the alleged banks.

1 Planells is currently housed in Pahrump, Nevada at a Corrections Corporation of  
2 America (CCA) facility. The extent of the involvement of so many individuals charged  
3 and uncharged clearly shows that Planells involvement if any is minimal. Witnesses  
4 that are not bank employees need to be interviewed, including potential alibi witnesses.  
5

6 We are requesting an Order allowing Tobiasson to visit with Planells to discuss  
7 his alibis.  
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9 DATED this 23<sup>rd</sup> day of March, 2015.  
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13 /S/ Chris T. Rasmussen, Esq.  
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1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 \* \* \*

4 UNITED STATES OF AMERICA, )

5 Plaintiff, )

2:14-CR-260-JAD-GWF

6 v. )


7 ALBERT PLANELLS, )

8 Defendant. )

9 \_\_\_\_\_ )  
10  
11 **ORDER DIRECTING CORRECTIONS CORPORATION OF AMERICA TO ALLOW**  
12 **LICENSED INVESTIGATOR TODD TOBIASSON TO HAVE CONTACT VISITATION**  
13 **WITH ALBERT PLANELLS**  
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15  
16 IT IS HEREBY ORDERED: That Corrections Corporation of America allow TODD  
17 TOBIASSON to have a contact visit with ALBERT PLANELLS.

18 DATED this 24th day of March, 2015.  
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22 \_\_\_\_\_  
Magistrate Judge  
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